

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

IN RE:	§	CHAPTER 11
	§	
KRISJENN RANCH, LLC	§	CASE NO. 20-50805-rbk
	§	
DEBTOR	§	(Jointly Administered)

**KRISJENN RANCH, LLC, KRISJENN RANCH LLC, SERIES UVALDE RANCH, AND
KRISJENN RANCH, LLC, SERIES PIPELINE ROW'S FIRST AMENDMENT TO
FOURTH AMENDED SUBSTANTIVELY CONSOLIDATED PLAN OF
REORGANIZATION**

PURPOSE

On February 3, 2022, Debtors filed their Fourth Amended Substantively Consolidated Plan of Reorganization (“Fourth Amended Plan”). While the Fourth Amended Plan disallowed the claims of DMA, Frank Daniel Moore, and Longbranch Energy related to the pipeline pursuant to the adversary case judgement in 20-05027, the Debtors create language in the plan that addressed the creditor’s concerns while not impeding Debtors’ need to monetize the pipeline. The terms provided for notice to the creditors of any potential sale and affirmatively provided any successful appeal would attach to the proceeds of the sale or transfer of any interest in the pipeline. However, the terms were rejected by the creditors’ objections to plan confirmation. The purpose of this amendment is to modify the proposed treatment to reflect the Court’s judgment in case 20-05027 to allow the case to be confirmed. To the extent the Fourth Amended Plan is not modified herein, it remains in full force and effect and subject to confirmation by the Bankruptcy Court.

AMENDMENTS

1. The Class 3 treatment stated in the Fourth Amended Plan is deleted and replaced with the following:

Class 3 is the joint claim of DMA Properties, Inc. (“DMA”) and Longbranch Energy, LP (“Longbranch”). Claim 7 in 20-50805.

DMA and Longbranch filed one joint claim related to the adversary action claiming an interest in the Express Pipeline (as defined in the Disclosure Statement) and other miscellaneous relief. These claims were all denied through the trial in case 20-05027. As a result, these claims are disallowed in their entirety pursuant to the Court’s judgment in case 20-05027 and will not receive any distribution under the Plan.

Class 3 is unimpaired and does not vote on the plans.

2. The Class 4 treatment stated in the Fourth Amended Plan is deleted and replaced with the following:

Class 4 are the claims of Longbranch Energy, LP (“Longbranch”). Claim 4 in 20-51083 and Claim 8 in 20-51084.

Longbranch filed claims related to the adversary action claiming an interest in the Express Pipeline (as defined in the Disclosure Statement) and other miscellaneous relief. These claims were all denied through the trial in case 20-05027. As a result, these claims are disallowed in their entirety pursuant to the Court’s judgment in case 20-05027 and will not receive any distribution under the Plan.

Class 4 is unimpaired and does not vote on the plans.

Respectfully submitted,

BY: /s/ Larry Wright

Name: Larry Wright, Manager, KrisJenn Ranch,
LLC, KrisJenn Ranch, LLC Series Uvalde Ranch,
KrisJenn Ranch, LLC Series Pipeline Row.

THE SMEBERG LAW FIRM, PLLC

BY: /s/ Ronald J. Smeberg

Ronald J. Smeberg

4 Imperial Oaks

San Antonio, Texas 78248

Tel: (210) 695-6684

Fax: (210) 598-7357

ATTORNEY FOR DEBTORS

CERTIFICATE OF SERVICE

I certify that on February 15, 2022, a true and correct copy of the forgoing was served on the parties listed in the attached service list, via ECF and/or email service where available, and otherwise via First Class United States Postal service.

/s/ Ronald J. Smeberg
RONALD J. SMEBERG

SERVICE LIST

ECF SERVICE LIST

Via CM/ECF:

USTPRegion07.SN.ECF@usdoj.gov
Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-1539

Via CM/ECF:

houston_bankruptcy@publicans.com
Angelina County Tax Assessor
606 E Lufkin Ave,
Lufkin, Texas 75901

Via CM/ECF: mthomas@pbfc.com;

tylbkc@pbfc.com;
mthomas@ecf.courtdrive.com
Nacogdoches County Tax
Assessor Collector
101 West Main Street
Nacogdoches, Texas 75961

Via CM/ECF:

houston_bankruptcy@publicans.com
Shelby County, Tax Collector
200 St. Augustine St.
Center, Texas 75935

Via CM/ECF:

carce@pbfc.com; mvaldez@pbfc.com;
mvaldez@ecf.courtdrive.com
Uvalde Tax Assessor
Courthouse Plaza, Box 8
Uvalde, Texas 78801

Via CM/ECF: lfrank@bjplaw.com

Albert, Neely & Kuhlmann
1600 Oil & Gas Building
309 W 7th St
Fort Worth, TX 76102-6900

Via CM/ECF: lworsham@jonesallen.com;

kmcDonald@jonesallen.com
McLeod Oil, LLC
c/o Laura L. Worsham
JONES, ALLEN & FUQUAY, LLP
8828 Greenville Ave.
Dallas, Texas 75243

Via CM/ECF: mblack@burnsandblack.com

DMA Properties, Inc.
896 Walnut Street at US 123 BYP
Seneca, SC 29678

FIRST CLASS MAIL SERVICE LIST

Office of the UST
615 E Houston, Room 533
PO Box 1539
San Antonio, TX 78295-1539

Medina Electric
2308 18th St.
Po Box 370
Hondo, TX 78861-0370

U.S. Attorney
Attn: Bkcy Division
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

Medina's Pest Control
1490 S Homestead Rd
Uvalde, TX 78801-7625

Internal Revenue Services
Special Procedures Branch
300 E. 8th St. STOP 5026 AUS
Austin, TX 78701

Texas Farm Store
236 E Nopal St
Uvalde, TX 78801-5317

Texas Comptroller of Public Account
Attn: Bankruptcy
P.O. Box 149359
Austin, TX 78714-9359

Uvalco Supply
2521 E Main St
Uvalde, TX 78801-4940

Rusk County
202 N Main St,
Henderson, Texas 75652

Tenaha ISD Tax Assessor-Collector
138 College St
Tenaha, TX 75974-5612

C&W Fuels, Inc.
Po Box 40
Hondo, TX 78861-0040

Davis, Cedillo & Mendoza
755 E Mulberry Ave Ste 500
San Antonio, TX 78212-3135

Granstaff Gaedke & Edgmon
5535 Fredericksburg Rd Ste 110
San Antonio, TX 78229-3553

Hopper's Soft Water Service
120 W Frio St
Uvalde, TX 78801-3602